

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LUCY W. KAIRU,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

Case No. 2:22-cv-00154-BJR

STIPULATED MOTION AND ORDER  
FOR EXTENSION OF PRETRIAL  
DEADLINES

**JOINT STIPULATION**

The parties hereby jointly STIPULATE AND AGREE to extend the following trial date and related dates as set forth in the Court's June 30, 2022 Order Setting Trial Date and Related Dates (Dkt. 12), as set forth below.

<b><u>Deadline</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed New Deadline</u></b>
Reports from expert witness under FRCP 26(a)(2) due	November 28, 2022	December 28, 2022
Discovery completed by	December 28, 2022	February 28, 2023
All dispositive motions must be filed by	January 27, 2023	March 28, 2023

Good cause exists for extending these specific deadlines. Although the parties have conducted extensive fact discovery to date, including exchanging written discovery, setting and

1 taking depositions, and collecting thousands of pages of medical records, the parties need  
 2 additional time before expert witnesses can be disclosed. Due to holiday schedules, the timing of  
 3 when new medical records were received from medical facilities, and the significant volume of  
 4 records, the parties' experts need additional time to review records and prepare their expert reports.  
 5 The parties anticipate that an additional month will be sufficient for their experts to finalize their  
 6 reports. The parties reasonably anticipate that rebuttal experts will be named and an extension of  
 7 the close of discovery by two months will allow the parties time to depose any rebuttal experts  
 8 prior to the close of discovery.

9 For the reasons set forth above, the parties believe that there is good cause to request an  
 10 extension of the above-listed trial date and related dates and respectfully request that the Court  
 11 grant their motion.

12 **SO STIPULATED.**

13 Dated this 15th day of November, 2022.

14 NICHOLAS W. BROWN  
 15 United States Attorney

CMG LAW

16 s/ Whitney Passmore  
 17 WHITNEY PASSMORE, FL No. 91922

s/ Tyler Goldberg-Hoss  
 TYLER GOLDBERG-HOSS, WSBA No. 41653  
 115 NE 100th Street, Ste. 220

18 s/ Nickolas Bohl  
 19 NICKOLAS BOHL, WSBA No. 48978  
 Assistant United States Attorneys  
 United States Attorney's Office  
 700 Stewart Street, Suite 5220  
 20 Seattle, Washington 98101-1271  
 Phone: 206-553-7970

Seattle, WA 98125  
 Phone: 206-443-8600  
 Email: [tyler@cmglaw.com](mailto:tyler@cmglaw.com)

*Attorney for Plaintiff*

21 Fax: 206-553-4067  
 Email: [whitney.passmore@usdoj.gov](mailto:whitney.passmore@usdoj.gov)  
 22 Email: [nickolas.bohl@usdoj.gov](mailto:nickolas.bohl@usdoj.gov)

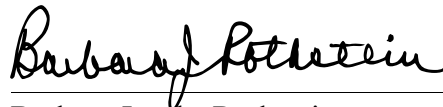
23 *Attorneys for United States of America*

**ORDER**

It is hereby ORDERED that the parties' motion is GRANTED. The new pretrial deadlines are as follows:

<u><b>Deadlines</b></u>	
Reports from expert witness under FRCP 26(a)(2) due	December 28, 2022
Discovery completed by	February 28, 2023
All dispositive motions must be filed by	March 28, 2023

DATED this 18th day of November, 2022.



Barbara Jacobs Rothstein  
U.S. District Court Judge